

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

KATHRYN KNOWLTON, DANA McCORMICK,
et al.,

Plaintiffs,

v.

Case No. 2020-CV-01660

CITY OF WAUWATOSA, BARRY WEBER,
DENNIS McBRIDE, et al.,

Defendants.

**DEFENDANTS' MOTION TO QUASH PLAINTIFFS' NOTICE OF DEPOSITION FOR
KATHY CAUSIER AND MOTION TO STRIKE DEPOSITION TRANSCRIPT**

Defendants, City of Wauwatosa, Barry Weber, Dennis McBride, Dominick Ratkowski, George Schimmel, Luke Vetter, Jeffrey Farina, Joseph Roy, Joseph Lewandowski, Martin Keck, Shane Wrucke, and Kathy Causier, by their attorneys, Gunta Law Offices, S.C., move the Court to quash Plaintiffs' notice of deposition for Kathy Causier and to strike her deposition transcript pursuant to Fed. R. Civ. P. 26(c)(3), 32(d)(4), 37(a)(5) and 45. Prior to filing this Motion, the parties met and conferred in good faith in an effort to resolve this discovery dispute.

The grounds for this Motion are more fully set forth in the accompanying Brief in Support of Defendants' Motion and the Declaration of Kiley B. Zellner, which are incorporated by reference as if fully set forth herein. Defendants also seek sanctions and costs associated with this motion.

Dated at Wauwatosa, Wisconsin this 30th day of September, 2021.

GUNTA LAW OFFICES, S.C.
Attorneys for Defendants

/s/ Kiley B. Zellner

Gregg J. Gunta, WI Bar No. 1004322
Ann C. Wirth, WI Bar No. 1002469
Jasmyne M. Baynard, WI Bar No. 1099898
Kyle R. Moore, WI Bar No. 1101745
Kiley B. Zellner, WI Bar No. 1056806
9898 W. Bluemound Road, Suite 2
Wauwatosa, Wisconsin 53226
T: 414) 291-7979 / F: (414) 291-7960
Emails: gjg@guntalaw.com
acw@guntalaw.com
jmb@guntalaw.com
krm@guntalaw.com
kbz@guntalaw.com